

## **REMARKS**

### **Amendments**

#### ***To the Drawings***

The Examiner stated that formal drawings were required in response to the present Office Action. However, the Examiner did not state why the drawings as originally filed are deficient, nor was a Draftsman review attached to the present Office Action.

Applicant has reviewed the drawings as filed and finds no deficiency. Therefore, Applicant respectfully requests the Examiner indicate his acceptance of the drawings as filed in the next Office Action, or provide an explanation of why the drawings as filed are deficient.

#### ***Amendments to the Claims***

Applicant has amended the claims to move language from the claim preambles into the body of the claims. No new matter has been added as a result of these amendments.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 102(b)***

##### **Claims 1-22**

Claims 1-22 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,652,880 to Seagraves. Applicant respectfully submits that Seagraves does not disclose each and every element of the invention as claimed in claims 1-22.

Seagraves discloses using codified linkages between related objects in a database for querying and presenting such objects, their linkages and data concerning the linkages. The object data and linkages are grouped together in an outline format so the querying is referred to as "Query-By-Outline" (QBO). The object data is textual in nature.

Applicant's invention is directed toward audiovisual information, i.e. images and sounds for multimedia content, such as a video. Applicant's invention as claimed in independent claims 1 and 12 uses entities describing non-relational parts of a semantic description of audiovisual information and concepts containing a collection of properties of the audiovisual information to produce a description of the audiovisual information.

Applicant's invention as claimed in independent claims 4 and 15 use the entities and concepts to describe an arbitrary structure related to the audiovisual information for use in classifying, storage and retrieval of audiovisual information. Applicant's invention as claimed in independent claims 7 and 18 instantiate a semantic description of the audiovisual information from a concept by linking entities within the semantic description to corresponding properties in the concept that characterize the semantics of the audiovisual information.

Seagraves is directed toward presenting textual information associated with objects in the form of an outline that groups and links the objects and textual information together. Seagraves contains no disclosure regarding entities, concepts or semantics of audiovisual information as defined by Applicant in the claims and in the specification. Thus, Seagraves fails to teach or suggest any of the following elements claimed by Applicant: 1) entities that describe non-relational parts of a semantic description of audiovisual information; 2) a concept as a collection of properties of audiovisual information; 3) an arbitrary structure built from entities and concepts of audiovisual information for use in classifying, storage and retrieval of the audiovisual information; and 4) instantiating a semantic description of audiovisual information from a concept using entities and concept properties.

Accordingly, Applicant respectfully submits that the invention claimed claims 1-22 is not anticipated by reference under 35 U.S.C. § 102(b) and respectfully requests the withdrawal of the rejection of the claims.

### **SUMMARY**

Claims 1-22 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

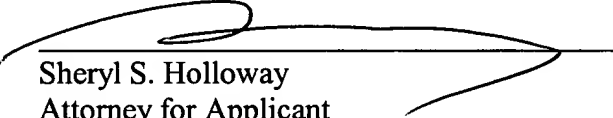
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

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